

EXHIBIT A

AFFIDAVIT OF RAYMOND ARCAND

I, Raymond Arcand, being duly sworn, do hereby depose and state as follows:

1. I am a Special Agent ("SA") with the United States Secret Service ("USSS") and have been so employed since March 22, 1999. I am currently assigned to the Boston, Massachusetts Field Office. Among training for other duties, I have received specialized training in the investigation of various federal crimes including access device fraud, bank fraud, forgery and counterfeiting of United States Treasury checks, forgery and counterfeiting of commercial obligations and securities, as well as training in the identification of counterfeit United States currency and counterfeit access devices.

2. Based on my training and experience, I know that individuals who wish to steal bank account information sometimes employ skimming devices and pin hole cameras. A "skimmer" is a device used to procure the information contained on the magnetic strip on the back of an ATM or other access device card, such as a credit or debit card. Some skimmers are attached as an overlay to the part of the ATM where the card is inserted. The skimmer appears to be part of the ATM. When a customer inserts his or her card into the device, the skimmer records the information from the magnetic strip. That information is later transferred to the magnetic strips on other blank cards which are then used

to unlawfully obtain funds from the compromised accounts. Pin hole cameras are often used in conjunction with skimmers in order to capture the Personal Identification Number (PIN) of the cards being compromised. The camera is focused on the ATM's numeric keypad and records the customer entering his or her PIN as the card is skimmed.

3. I am aware that Title 18 of the United States Code, Sections 1029(a)(4) and (b)(1) make it a crime for anyone to knowingly, and with intent to defraud, produce, traffic in, have control or custody of, or possess device-making equipment that affects interstate commerce, or to attempt to do so. I am also aware that Title 18 of the United States Code, Section 1344 makes it a crime for anyone to knowingly execute and attempt to execute a scheme or artifice to defraud a federally-insured financial institution and to obtain money, funds and property owned by and under the custody and control of that financial institution by means of materially false and fraudulent pretenses and representations. Having so said, I make this affidavit in support of a criminal complaint charging Razvan Pascu ("Pascu") with aiding and assisting in access device fraud in violation of Title 18, United States Code, Sections 1029 (a)(4) and (b)(1) and United States Code, Section 2, and bank fraud in violation of Title 18, United States Code, Sections 1344 and 2.

4. The facts stated herein are based on my own personal involvement with this investigation, as well as from information provided to me by other law enforcement officers involved in the investigation. In submitting this affidavit, I have not included each and every fact known to me about this investigation. Rather, I have only submitted those facts which I believe are sufficient to establish probable cause.

5. On April 30, 2011, a concerned citizen ("Concerned Citizen") telephoned the Cambridge Police Department to report a suspicious person entering and exiting the Eastern Bank ATM vestibule at 176 Alewife Brook Parkway, Cambridge, MA. The Concerned Citizen advised that he saw this individual repeatedly walk into the ATM vestibule and then return to a car parked in a near-by parking lot. This car was a gray 2009 Chrysler 300, with New York registration FHW4206. Each time this individual entered into the ATM vestibule, he pulled his hood over his head and put on sunglasses. When the individual exited the vestibule, he removed his hood and sunglasses.

6. Concerned Citizen further advised that while he was inside the ATM vestibule, he (Concerned Citizen) observed the individual tampering with the ATM machine. Concerned Citizen described this individual as a white male, approximately late 20s early 30s wearing blue jeans, sneakers, a black hooded sweatshirt, sunglasses, and a satchel.

7. Upon arrival on the scene in response to Concerned Citizen's telephone call, Cambridge Police Officer Steven Allen interviewed Concerned Citizen. Concerned Citizen repeated his description of the individual he observed tamper with the ATM machine as well as repeatedly entering and exiting the vestibule. In particular, he described the individual as a white male, approximately in his late 20's or early 30's, wearing blue jeans, a black hooded sweatshirt, a baseball cap, wearing sunglasses and sporting a satchel. He also repeated his description of the car he observed this individual enter and exit.

8. Concerned Citizen pointed out to Office Allen the location of the individual he observed. This individual was walking in the same mall area as the ATM. Additionally, a gray 2009 Chrysler 300, bearing NY license plate number FHW4206 was parked in the mall parking lot. Office Allen approached this individual who matched the general description provided by Concerned Citizen in his call to the Cambridge Police. When approached, the individual identified himself as Razvan Pascu and gave the police a Romanian Passport bearing Passport # 050226604, and a DOB of 9/11/80.

9. Pascu stated he had been in the ATM vestibule area of the Eastern Bank to grab a brochure, but that he had not taken any money out of the ATM. Pascu stated that he was waiting there for a friend named "Roberta."

10. Pascu told Officer Allen that he was the operator of the gray 2009 Chrysler 300, bearing NY license plate number FHW4206 which was parked nearby. Pascu then gave consent to Officer Allen and members of the Cambridge Police Department to search the vehicle. After searching the vehicle, the Cambridge Police located Romanian Passport # 15033804, bearing the name Alexandru Ionut Moiceanu, DOB 7/20/82. Also located in the car were several pieces of paper that listed 30-40 addresses in the Boston/Cambridge and New York Metropolitan areas. The addresses on these papers were subsequently identified as addresses for banks and/or ATM machines.

11. One of the addresses on the papers found in the car was 246 Border Street, East Boston, MA. This is an address for an Eastern Bank ATM machine. I subsequently learned that a pin hole camera had recently been installed surreptitiously on the ATM machine at this location.

12. Also located in the well of the trunk of the gray 2009 Chrysler 300, in an area where a spare tire would be located, was white laptop computer. The computer was secreted beneath the carpeting of the trunk of the car.

13. I have reviewed a copy of several still images from the ATM surveillance video for the ATM located at 176 Alewife Brook Parkway, Cambridge, MA on April 30, 2011. Among the images I have viewed are those of a person entering the ATM vestibule area at approximately 13:13 hrs wearing a baseball hat, sweat pants,

and a gray or white long sleeved shirt with an emblem on the left upper arm. The individual is a white male in his late 20's or 30's. Subsequent images display the same individual returning at approximately 13:52 hrs wearing the same sweat pants, the same shirt with an emblem on the left upper arm, and the same baseball hat. Additionally, the individual is wearing sunglasses and a blue hooded vest over his shirt and is carrying a satchel over his shoulder. Based on my training and experience, the person depicted in these still images appears similar to the person identified in the passport found in the gray 2009 Chrysler 300, i.e., Alexandru Ionut Moiceanu, DOB 7/20/82.

14. I have also reviewed still images from the ATM located at 176 Alewife Brook Parkway at approximately 13:45 P.M. Those images depict a different person entering the ATM vestibule, who walks over to a table displaying pamphlets. This individual is wearing a dark colored sweatshirt with a hood, a dark colored sleeveless vest, blue jeans, sneakers, and a hat underneath his hooded sweatshirt. This individual is a white male in his late 20's or 30's. Based upon my training and experience, the person in these still images is Razvan Pascu. Indeed, Razvan Pascu was wearing the same clothing as the person depicted in these images when he was stopped by the Cambridge Police.

15. Upon further investigation of the ATM machine located at 176 Alwife Brook Parkway, Cambridge, MA, law enforcement officers discovered a skimming device and pin hole camera attached to the face of the ATM machine.

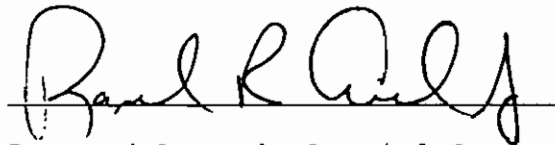
16. Based on reports from other law enforcement officers, I knew that there have been previous incidents in which pin hole cameras and skimming devices have been placed on ATM machines in Connecticut. In particular, I am aware that on Saturday April 9, 2011 such devices were discovered at a Webster Bank ATM located in West Hartford, CT. There also have been skimming incidents at the Bank of America in Stratford, CT on March, 26-27, 2011 and Brookfield, CT on March, 26, 2011.

17. I have reviewed surveillance photographs depicting the individuals who law enforcement believe installed the skimming devices in West Brookfield, West Hartford, and Stanford Connecticut. Based on my training and experience, one of the persons depicted in these photographs meets the description of Razvan Pascu. The other person depicted in these photographs appears similar to the photograph of Alexandru Ionut Moiceanu on the Romanian passport found in the gray 2009 Chrysler 300 on April 30, 2011. Indeed, he appears to be wearing the same dark vest. Moreover, I have observed that the hat that Pascu was wearing when stopped by the Cambridge Police on April 30, 2011 is the same hat that the person who matches the description of Alexandru Ionut Moiceanu was wearing in the Stratford, CT

incident. I have also observed from these surveillance photographs that one of the suspects frequently use a satchel to carry the pin hole camera and skimming devices into and out of the ATM lobbies. This satchel appears similar to the satchel worn by one of the persons depicted in the April 30, 2011 incident at the ATM located at 176 Alewife Brook Parkway in Cambridge, MA.

18. I have also reviewed photographs of the skimming device and pin hole camera recovered in Brookfield, CT. The devices depicted in those photographs appear to be the same type of devices retrieved from the Eastern Bank ATM vestibule at 176 Alewife Brook Parkway, Cambridge, MA on April 30, 2011. Moreover, all of the aforementioned skimming incidents have involved the same Diebold D760 & 720 ATM machines.

19. Based on the foregoing, I have probable cause to believe that on or about April 30, 2011 Razvan Pascu aided and assisted in access device fraud in violation of Title 18, United States Code, Sections 1029 (a)(4) and (b)(1) and United States Code, Section 2, and bank fraud in violation of Title 18, United States Code, Sections 1344 and 2.

A handwritten signature in black ink, appearing to read "Raymond Arcand", written over a horizontal line.

Raymond Arcand, Special Agent

United States Secret Service

Sworn to and subscribed before me this 2d day of May, 2011.

A handwritten signature in black ink, appearing to read "Leo T. Sorokin", written over a horizontal line.

LEO T. SOROKIN

United States Magistrate Judge